

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NICOLE HARRIS,

Plaintiff,

v.

**CITY OF CHICAGO, Chicago Police
Officers ROBERT BARTIK, #3078;
DEMOSTHENES BALODIMAS,
#21204, ROBERT CORDARO, #20680,
JOHN J. DAY, #20926, JAMES M. KELLY,
, #21121, MICHAEL LANDANDO, #20417,
ANTHONY NORADIN, #21252, and
RANDALL WO, #20232; Assistant Cook
County State's Attorneys ANDREA
GROGAN and LAWRENCE O'REILLY;
and the COUNTY OF COOK,**

Defendants.

No. 1:14-cv-04391

Hon. John W. Darrah

Hon. Mag. Susan E. Cox

APPENDIX TO

**DEFENDANT CITY OF CHICAGO'S
RULE 56.1 SEPARATE STATEMENT OF ADDITIONAL UNDISPUTED FACTS
IN SUPPORT OF ITS' MOTION FOR PARTIAL SUMMARY JUDGMENT
AND
DEFENDANT CITY OF CHICAGO'S RESPONSES TO PLAINTIFF'S LOCAL RULE
56.1(B)(3)(C) STATEMENT OF ADDITIONAL FACTS RELATED TO THE CITY'S
PARTIAL MOTION FOR SUMMARY JUDGMENT**

| APP # | |
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| Group 1 | Cleared felony arrests statistics from the CPD Annual Reports for years 1989, 1991, 1995, 1996, 1999-2006, 2008-2010 |
| 2 | Donald O'Neill Declaration dated March 29, 2016 |
| 3 | CITY5293 – Memo dated November 19, 2008 from Tina Skahill to Jody Weis – Exhibit to Donald O'Neill March 29, 2016 Declaration |
| 4 | Excerpts from the deposition of Donald O'Neill taken on January 29, 2016 |

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| 5 | Kyle Flynn Affidavit dated March 29, 2016 |
| 6. | Screenshot of Robert Bartik Detection of Deception Examiner license – Exhibit to Kyle Flynn’s March 29, 2016 Affidavit |
| 7 | Excerpts from the deposition of Richard A. Leo, Ph.D. taken March 21, 2016 |
| 8. | Excerpts from the deposition of Hector Lopez taken on November 4, 2015 |
| 9. | Excerpts from the deposition of John Day taken on November 12, 2015 |
| 10 | Excerpts from the deposition of Demosthenes Balodimas taken on November 16, 2015 |
| 11. | Excerpts from the deposition of Robert Cordaro taken on November 30, 2015 |
| 12. | Excerpts from the deposition of James Hickey taken January 21, 2016 |
| 13. | Excerpts from the deposition of Robert Bartik taken on November 24, 2015 |
| 14. | Eric Winstrom Declaration dated March 29, 2016 |
| 15. | CITY15878 – 15878_106 – Exhibit to E. Winstrom March 29, 2016 Declaration |